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*Lead Counsel for the
Direct Purchaser Plaintiffs*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

ALL DIRECT PURCHASER ACTIONS

Master File No. CV-07-5944-SC

MDL No. 1917

**DECLARATION OF ROSS MURRAY RE
DISSEMINATION OF NOTICE AND
CLAIM FORMS TO CLASS MEMBERS
AND LACK OF OBJECTIONS TO
PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES AND COSTS**

Date: October 23, 2015
Time: 10:00 a.m.
Judge: Hon. Samuel Conti
Courtroom: 1

1 I, Ross Murray, declare as follows:

2 1. I am employed by Gilardi & Co., LLC (“Gilardi”), located at 3301 Kerner Blvd.,
3 San Rafael, California. Gilardi was hired by class counsel as the Settlement Administrator in this
4 matter. I am over 21 years of age and am not a party to this action. I have personal knowledge of
5 the facts set forth herein and, if called as a witness, could and would testify competently thereto.

6 2 Gilardi was formed in 1984 to assist attorneys with securities, antitrust, consumer
7 protection class actions, and other similar matters. Gilardi specializes in designing, developing,
8 analyzing, and implementing settlement administration plans that support due process. During
9 the past 28 years Gilardi has administered class notice and class settlements in over 3,500 class
10 actions, and has distributed more than \$20 billion in assets.

11 3. Between May 16 and May 29, 2012 Gilardi received from Plaintiffs’ Counsel eight
12 files which included the names, and, where available, the addresses and electronic mail addresses
13 of all class members identified by Defendants in this matter. Gilardi formatted the list for mailing
14 purposes, removed duplicate records, removed known Defendant entities, researched company
15 names lacking addresses and added addresses where found, and processed the names and
16 addresses through the National Change of Address Database to update any addresses on file with
17 the United States Postal Service (“USPS”).

18 4. On September 11, 2015, Gilardi caused copies of the court-approved Notice
19 Regarding Claims (“Notice”) and the Proof of Claim Form (“Claim Form”) (together, the “Claim
20 Packet”) to be printed and mailed to the 16,941 unique names and addresses on the class list.
21 Gilardi delivered the Claim Packets to the United States Post Offices located in Santa Rosa,
22 California in addressed envelopes with first class postage prepaid thereupon. True and correct
23 copies of the Notice and the Claim Form are attached hereto as Exhibits A and B, respectively.

24 5. On September 11, 2015, Gilardi also caused the Notice to be electronically
25 distributed to the 873 unique electronic mail addresses on the class list.

26 6. On or before June 7, 2012, Gilardi established a case-dedicated website at
27 www.CRTDirectPurchaserAntitrustSettlement.com. This website has been used to allow public
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1 access to various materials relevant to this lawsuit, including notices of settlement, settlement
2 agreements, and court orders. In preparation for the claims process in this litigation, Gilardi has
3 configured the website so that class members can file claims using an online claim form.

4 7. On September 11, 2015, I caused electronic copies of (1) the Notice; (2) the Claim
5 Form; (3) Direct Purchaser Plaintiffs' Notice of Motion and Motion for an Award of Attorneys'
6 Fees and Reimbursement of Expenses; Memorandum of Points and Authorities in Support
7 Thereof (Sept. 11, 2015) (Dkt. No. 4055) ("Fee Motion") and the principal declarations in support
8 thereof; (4) Direct Purchaser Plaintiffs' Notice of Motion and Motion for Class Representative
9 Incentive Award; Memorandum of Points and Authorities in Support Thereof (Sept. 11, 2015)
10 (Dkt. No. 4056) ("Incentive Award Motion") and supporting declaration; and (5) the proposed
11 orders for both motions to be posted the class website. On the morning of September 12, 2015, I
12 caused the remaining declarations in support of the fee motion to be posted to the class website.

13 8. Class members can also view Frequently Asked Questions and obtain Gilardi's
14 contact information on the class website. On or before September 11, 2015, Gilardi caused the
15 "Home," "Frequently Asked Questions," and "Dates to Remember" pages of the website to be
16 updated with all deadlines relevant to the claims process and the Fee Motion and Incentive Award
17 Motion, including the date of the hearing on the Fee Motion and the date to object to the Fee
18 Motion.

19 9. On or before June 7, 2012, Gilardi activated a toll-free telephone number, 1-877-
20 224-3063, through which callers are able to connect with a live customer service representative
21 Monday through Friday from 7:00 a.m. to 5:00 p.m. Pacific Time. English and Spanish operators
22 are available.

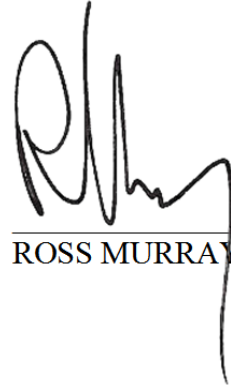
23 10. Through its in-house advertising agency, Larkspur Design Group, Gilardi caused
24 the Claim Notice to be published in the national edition of the *Wall Street Journal* on September
25 11, 2015. A true and correct copy of the tear sheet provided by the *Wall Street Journal* is
26 attached hereto as Exhibit C.

27 11. I am informed that the deadline for class members to file with the Court any
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1 objections to the Fee Motion was October 2, 2015. To date, Gilardi has not received any
2 communication indicating that anyone objects to, has a comment on, or otherwise wishes to be
3 heard regarding the Fee Motion or the Incentive Award Motion.

4 I declare under penalty of perjury that the foregoing is true and correct, and that this
5 declaration was executed this 8th day of October, 2015 at San Rafael, California.

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ROSS MURRAY

Exhibit A

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

If You Directly Bought A Cathode Ray Tube Product, A Class Action Settlement May Affect You.

Cathode Ray Tube (CRT) Products include Cathode Ray Tubes and finished products that contain a Cathode Ray Tube such as Televisions and Computer Monitors.

A Federal Court authorized this Notice. This is not a solicitation from a lawyer.

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- **Why did I get this notice?** You or your company may have directly purchased a cathode ray tube (CRT) or a product containing a cathode ray tube (television or monitor) between March 1, 1995 and November 25, 2007. A direct purchaser is a person or business who bought a CRT, or a television or computer monitor containing a CRT, directly from one or more of the Defendants, co-conspirators, affiliates, or subsidiaries. A direct purchaser is NOT a person or company who purchased a CRT or CRT Product from a wholesaler or a retail store. If you are a direct purchaser, you have the right to know about the litigation and about your legal rights and options. The Court in charge of the case is the United States District Court for the Northern District of California, and the case is called *In re Cathode Ray Tube (CRT) Antitrust Litigation*, MDL No. 1917. The people who sued are called Plaintiffs and the companies they sued are called Defendants.
 - All Defendants who have appeared to date in the Direct Purchaser Cathode Ray Tube (CRT) Antitrust Litigation, Case No. 3:07-cv-5944 SC have settled their claims. The Court has finally approved each of the settlements with the Defendants and the settlement proceeds are ready to be distributed to qualifying claimants. Attached to this Notice is a Proof of Claim form that has been approved by the Court. All Proof of Claim forms must be postmarked or submitted online no later than December 10, 2015. Claims may be mailed to the address set forth in the Proof of Claim form, or submitted online at www.CRTDirectPurchaserAntitrustSettlement.com. Additional Proof of Claim forms may be obtained at www.CRTDirectPurchaserAntitrustSettlement.com, by calling 1-877-224-3063, or writing to CRT Direct Settlement, P.O. Box 808003, Petaluma, CA 94975-8003. Please do not contact the Court about claim administration.
 - Plaintiffs' Motion for Attorneys' Fees and Costs is on file with the Court and available at www.CRTDirectPurchaserAntitrustSettlement.com. The Court has set a hearing on plaintiffs' motion for October 23, 2015 at 10:00 a.m. in Courtroom 1. Any comments or objections to Plaintiffs' Motion for Attorneys' Fees and Costs must be filed with the Court (Honorable Samuel Conti, United States District Court Northern District of California, 450 Golden Gate Avenue, Courtroom 3, 17th floor, San Francisco, CA 94102) no later than October 2, 2015.

Dated: September 11, 2015

BY ORDER OF THE COURT

**For More Information: Call 1-877-224-3063 or Visit
www.CRTDirectPurchaserAntitrustSettlement.com**

Exhibit B

Industria Electronica Ltda., LP Displays International, Ltd. f/k/a LG. Philips Displays, Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung SDI Co. Ltd., Samsung SDI America, Inc., Samsung SDI Mexico S.A. de C.V., Samsung SDI Brasil Ltda., Shenzhen Samsung SDI Co. Ltd., Tianjin Samsung SDI Co. Ltd., Samsung SDI Malaysia Sdn. Bhd., Toshiba Corporation, Toshiba America Consumer Products, Inc., Toshiba Display Devices (Thailand) Company, Ltd., Toshiba America Information Systems, Inc., Toshiba America, Inc., Toshiba America Electronic Components, Inc., Panasonic Corporation f/k/a Matsushita Electric Industrial, Ltd., Matsushita Electronic Corporation (Malaysia) Sdn. Bhd., Panasonic Corporation of North America, Panasonic Consumer Electronics Co., MT Picture Display Co., Ltd., Beijing-Matsushita Color CRT Company, Ltd. (BMCC), Hitachi, Ltd., Hitachi Displays, Ltd. (n/k/a Japan Display Inc.), Hitachi Electronic Devices (USA), Inc., Hitachi America, Ltd., Hitachi Asia, Ltd., Shenzhen SEG Hitachi Color Display Devices, Ltd., Samtel Color, Ltd., Tatung Company of America, Inc., Chunghwa Picture Tubes Ltd., Chunghwa Picture Tubes (Malaysia) Sdn. Bhd., IRICO Group Corporation, IRICO Display Devices Co., Ltd., IRICO Group Electronics Co., Ltd., Thai CRT Company, Ltd., Daewoo Electronics Corporation f/k/a Daewoo Electronics Company, Ltd., and Daewoo International Corporation.

“Co-Conspirator” or “Co-Conspirators” means Mitsubishi Electric Corporation; Mitsubishi Electric US, Inc. (f/k/a Mitsubishi Electric & Electronics USA, Inc.); Mitsubishi Electric Visual Solutions America, Inc. (f/k/a Mitsubishi Digital Electronics America, Inc.); Technicolor USA, Inc. (f/k/a Thomson Consumer Electronics, Inc.); Technicolor SA (f/k/a Thomson SA); Videocon Industries, Ltd.; and Technologies Displays Americas LLC (f/k/a Thomson Displays Americas LLC).

C) “Class” means all persons and entities who, between March 1, 1995 and November 25, 2007, directly purchased a CRT Product in the United States from any defendant or subsidiary or affiliate thereof, or any co-conspirator (“Settlement Class”).

D) “Releasees” shall refer jointly and severally, individually and collectively to all defendants listed above and their respective past and present parents, subsidiaries, affiliates, officers, directors, employees, agents, attorneys, servants, representatives (and the parents’, subsidiaries’, and affiliates’ past and present officers, directors, employees, agents, attorneys, servants, and representatives), and the predecessors, successors, heirs, executors, administrators, and assigns of each of the foregoing.

E) “Cathode Ray Tube Products” means Cathode Ray Tube Products of any type (e.g. color display tubes and color picture tubes) and finished products which contain Cathode Ray Tubes, such as Televisions and Computer Monitors.

F) “Class Members” means all members of the Class who did not timely and validly elect to be excluded from the Class certified by the Court.

PART 3: SCHEDULE OF QUALIFYING PURCHASES

Report separately purchases of Cathode Ray Tubes and Finished Products containing Cathode Ray Tubes (“CRT Finished Products”) made directly from any Defendant or Co-Conspirator (listed in Sections A, B, and C below) from March 1, 1995 through November 25, 2007. Cathode Ray Tubes can be either Color Picture Tubes “CPTs” or Color Display Tubes “CDTs” collectively referred to as “CRTs.” CRT Finished Products are electronic devices containing CPTs (televisions) or CDTs (computer monitors). **In order to qualify as a claim, your purchase(s) must have been billed to and/or shipped to a location in the United States.** Foreign transactions where billing and shipping took place outside of the U.S. do not qualify. **If you have submitted a request for exclusion from the Settlement Class in connection with settlements, do not submit this Claim Form. Also, if you entered into a settlement with any defendant or Co-Conspirator for your purchase(s) from that defendant or Co-Conspirator, or assigned or transferred your claim for any purchase(s), your Claim Form must not include, as part of your claim, any of those purchases.** For example, if Class member A purchased \$10,000 from defendant 1 and entered into a settlement with defendant 1 for those purchases, that \$10,000 must not be included as part of Class member A’s claim. Failure to include all purchases will reduce the amount of your payment. You **DO NOT** need to attach documentation. However, you must keep copies of your purchase order(s), invoice(s), or other documentation of your purchase(s) in case verification of your claim is necessary.

In Sections A, B, and C below, list the total dollar amount (in U.S. dollars) of your purchases of Cathode Ray Tubes and/or CRT Finished Products made directly from each Defendant or Co-Conspirator from March 1, 1995 through November 25, 2007. ***Amounts should be rounded to the nearest dollar.*** Do not include transportation charges, rebates, refunds, credits, etc. If you did not purchase Cathode Ray Tubes or Cathode Ray Tube Products from a Defendant or Co-Conspirator, or if you settled with a particular Defendant or Co-Conspirator, assigned or transferred your claim, leave the boxes corresponding to that Defendant or Co-Conspirator blank.

SECTION A – Complete this Section ONLY if you directly purchased a CATHODE RAY TUBE from March 1, 1995 through November 25, 2007 from one of the entities listed below:

<u>Defendant</u>	Total purchase amount in USD										
Chunghwa ¹											.00
Daewoo ²											.00
Hitachi ³											.00
Irigo ⁴											.00
LG ⁵											.00
LPD ⁶											.00
Mitsubishi ⁷											.00
Panasonic ⁸											.00
<u>Defendant</u>	Total purchase amount in USD										
Philips ⁹											.00
Samsung ¹⁰											.00
Samtel ¹¹											.00
Tatung ¹²											.00
Thai CRT ¹³											.00
Thomson ¹⁴											.00
Toshiba ¹⁵											.00



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15. "T



PART 4: SUBMISSION TO JURISDICTION OF THE DISTRICT COURT

By signing below, you are verifying that:

1. You have documentation to support your claim and agree to provide additional information to Class Counsel or the Claims Administrator to support your claim if necessary;
2. You have not assigned or transferred (or purported to assign or transfer) or settled for the same purchases or submitted any other claim for the same purchases of CRT Products and have not authorized any other person or entity to do so, and know of no other person or entity having done so on your behalf;
3. The information provided in this Claim Form is accurate and complete; and
4. You agree to submit to the jurisdiction of the District Court for the Northern District of California, where this action is pending, for purposes of resolving any issues related to or arising from your claim.

PART 5: CERTIFICATION

I (WE) DECLARE, UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA, THAT THE INFORMATION PROVIDED IN THIS PROOF OF CLAIM FORM IS TRUE AND CORRECT.

This certification was executed on the _____ of _____, 2015, in _____.
(day) (Month) (City/State/Country)

SIGNATURE OF CLAIMANT: (If this claim is being made on behalf of Joint Claimants, then each must sign.)

Signature

Type/Print Name

Signature

Type/Print Name

Company's Name

Capacity of person signing; e.g. President

No later than December 10, 2015, submit your claim online at www.CRTDirectPurchaserAntitrustSettlement.com or mail the completed Claim Form to:

In re Cathode Ray Tube (CRT) Antitrust Litigation
c/o Gilardi & Co. LLC
P.O. Box 808003
Petaluma, CA 94975-8003

**ACCURATE PROCESSING OF CLAIMS MAY TAKE SIGNIFICANT TIME.
THANK YOU, IN ADVANCE, FOR YOUR PATIENCE.**



Exhibit C

THE WALL STREET JOURNAL.

Friday, September 11, 2015 | C7

BIGGEST 1,000 STOCKS

WSJ.com/stocks

How to Read the Stock Tables

The following explanations apply to NYSE, NYSE ARCA, NYSE MKT and Nasdaq Stock Market listed securities. Prices are composite quotations that include primary market trades as well as trades reported by Nasdaq OMX BXSM (formerly Boston), Chicago Stock Exchange, CBOE, National Stock Exchange, ISE and BATS.

Underlined quotations are those stocks with large changes in volume compared with the issue's average trading volume.

Boldfaced quotations highlight those issues whose prices have changed by 5% or more if their previous closing price was \$2 or higher.

Footnotes:
+New 52-week high.
-New 52-week low.
d Indicates loss in the most recent four quarters.
FD First day of trading.

h Does not meet continued listing standards.
IF Late filing.
t Temporary exemption from Nasdaq requirements.
+NYSE bankruptcy.

v Trading halted on primary market.
v In bankruptcy or receivership or being reorganized under the Bankruptcy Code, or securities assumed by such companies.

Wall Street Journal stock tables reflect composite regular trading as of 4 p.m. and changes in the closing prices from 4 p.m. the previous day.

Thursday, September 10, 2015																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
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